

THE HONORABLE LAUREN KING

UNITED STATES OF DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

LEO'S WELDING and FABRICATION, LLC, a
Washington limited liability company

Plaintiffs,

v.

HANNAH, Official Number 1067457, her
machinery, engines, equipment, cargo
appurtenances, *in rem* and SAYAK
LOGISTICS, LLC, an Alaska limited liability
company dba NORTHLINE SEAFOODS *in*
personam

Defendants.

Case No. 2:25-cv-00625 LK

DECLARATION OF IAN
BLACKBURN

I, IAN BLACKBURN, declare as follows:

1. I am over the age of 18, am competent to be a witness and make the following declaration based on my personal knowledge. I am an Area Senior Vice President for Arthur J. Gallagher Risk Management Services, Inc., and am Sayak Logistics LLC's (hereinafter "Sayak") insurance broker.

2. This declaration is submitted in support of Defendant Sayak Logistics, LLC's Opposition to Plaintiff's Motion for Arrest and For Appointment of Substitute Custodian.

DECLARATION OF IAN BLACKBURN - 1
Case No. 2:25-cv-00625

HOLMES WEDDLE & BARCOTT, PC
3101 WESTERN AVENUE, SUITE 500
SEATTLE, WA 98121
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3. In my role as Sayak's insurance broker, I placed hull insurance coverage on the HANNAH (hereinafter the "Vessel") for \$75,000,000.

4. Broadly speaking, hull insurance coverage protects against loss or damage to the Vessel.

5. The hull insurance policy has a "change of control" condition that an arrest may be determined by underwriters to be a breach of the policy covenants and therefore defeat the insurance coverage of the Vessel.

6. If the Vessel is arrested, then it is likely that all of Sayak's insurance policies for the vessel will be voided.

7. It required over six months of effort to secure the Vessel's current policies. If the Vessel's Hull & Machinery, Marine General liability, and excess coverage are voided, then the Vessel will be uninsured until new policies can be secured.

8. Obtaining new coverages is likely to be a slow process, as, in my experience, very few underwriters have any appetite to insure a vessel under arrest, and if any, will be at a substantially increased cost.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF WASHINGTON THAT THE FOREGOING IS TRUE AND CORRECT.

DATED at SEATTLE, Washington this 28th day of April, 2025

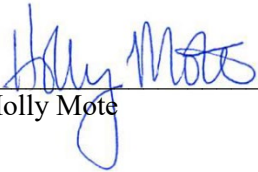

Ian Blackburn

CERTIFICATE OF SERVICE

The undersigned certifies under penalty of perjury of the laws of the State of Washington that, on the 30th day of April 2025, the foregoing was electronically filed with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following:

Attorneys for Plaintiff:

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Holly Mote